

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

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IN RE: BLUE CROSS BLUE SHIELD  
ANTITRUST LITIGATION  
(MDL No. 2406)

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**Master File No. 2:13-CV-20000-RDP**

This document relates to all cases.

**CERTAIN DEFENDANTS' NOTICE REGARDING  
RESPONSIVE PLEADINGS TO NEWLY-FILED COMPLAINTS**

Pursuant to the Parties' September 22, 2015 Joint Status Report [Dkt. No. 430], undersigned defendants hereby incorporate by reference and fully adopt their respective Answer and Affirmative Defenses to the Corrected Consolidated Second Amended Provider Complaint<sup>1</sup> as their responsive pleadings to the following complaints that have been transferred to this Court as part of MDL 2406:

- *Conway, et al. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1345 (originally filed in D. Ariz., 2:15-cv-1349)
- *Conway, et al. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1346 (originally filed in D. Kan., 5:15-cv-4905)
- *Conway, et al. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1348 (originally filed in S.D.N.Y., 1:15-cv-5539)
- *Conway, et al. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1349 (originally filed in E.D. Pa., 2:15-cv-3963)
- *Conway, et al. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1347 (originally filed in S.D. Miss., 3:15-cv-519)

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<sup>1</sup> Anthem, Inc. (MDL Dkt. No. 260); Cambia Health Solutions, Inc. (MDL Dkt. No. 270); Blue Cross Blue Shield of Florida, Inc. (MDL Dkt. No. 261); Hawaii Medical Service Association (MDL Dkt. No. 271); Horizon Blue Cross Blue Shield of New Jersey (MDL Dkt. No. 272); Louisiana Health Service & Indemnity Company (MDL Dkt. No. 262); Blue Cross and Blue Shield of Massachusetts, Inc. (MDL Dkt. No. 263); Blue Cross Blue Shield of Minnesota (MDL Dkt. No. 264); Blue Cross and Blue Shield of North Carolina (MDL Dkt. No. 265); Blue Cross Blue Shield of Rhode Island (MDL Dkt. No. 266); Blue Cross and Blue Shield of South Carolina (MDL Dkt. No. 267); Blue Cross Blue Shield of Tennessee (MDL Dkt. No. 268); Blue Cross Blue Shield of Vermont (MDL Dkt. No. 269); Wellmark, Inc. (MDL Dkt. No. 273).

- *Conway, et al. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1475 (originally filed in D.P.R., 3:15-cv-2002 )
- *Conway, et al. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1550 (originally filed in D. Wyo., 2:15-cv-00140)

Undersigned defendants, other than *Louisiana Health Service & Indemnity Company*, also incorporate by reference and fully adopt their respective Answer and Affirmative Defenses to the following complaint, which also has been transferred to this Court as part of MDL 2406:

- *Hosp. Serv. Dist. 1 of the Parish of E. Baton Rouge, La. d/b/a Lane Reg'l Med. Ctr. v. Blue Cross and Blue Shield of Alabama, et al.*, 2:15-cv-1476 (originally filed in M.D. La., 3:15-cv-523)<sup>2</sup>

Undersigned defendants deny each and every allegation in the aforementioned complaints except as expressly admitted in the Answers and Affirmative Defenses incorporated herein.

Undersigned defendants reserve the right to amend or seek to amend their respective Answer and/or Affirmative Defenses.

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<sup>2</sup> *Louisiana Health Service & Indemnity Company* is not a named defendant in this action.

Dated: October 19, 2015

Respectfully submitted,

/s/ Craig A. Hoover

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*Counsel for Anthem, Inc., f/k/a WellPoint, Inc., and all of its named subsidiaries in this consolidated action; Blue Cross and Blue Shield of North Carolina, Inc.; Blue Cross and Blue Shield of Florida, Inc.; Louisiana Health Service & Indemnity Company (Blue Cross and Blue Shield of Louisiana); Blue Cross and Blue Shield of Massachusetts, Inc.; BCBSM, Inc. (Blue Cross and Blue Shield of Minnesota); Blue Cross and Blue Shield of South Carolina; Blue Cross and Blue Shield of Tennessee, Inc.; Hawaii Medical Service Association (Blue Cross and Blue Shield of Hawaii); Horizon Healthcare Services, Inc. (Horizon Blue Cross and Blue Shield of New Jersey); Wellmark of South Dakota, Inc. (Wellmark Blue Cross and Blue Shield of South Dakota); Wellmark, Inc. (Wellmark Blue Cross and Blue Shield of Iowa); Blue Cross & Blue Shield of Rhode Island; Blue Cross and Blue Shield of Vermont; Cambia Health Solutions, Inc.; Regence Blue Shield of Idaho; Regence Blue Cross Blue Shield of Utah; Regence Blue Shield (of Washington); Regence Blue Cross Blue Shield of Oregon*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 19, 2015, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Craig A. Hoover  
Craig A. Hoover